

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<b>KEAH TINGLER,</b>	:	
	:	
<b>Plaintiff,</b>	:	
	:	
<b>v.</b>	:	<b>NO. 18-CV-01270</b>
	:	
<b>COMMONWEALTH OF</b>	:	<b>JUDGE JONES</b>
<b>PENNSYLVANIA,</b>	:	
<b>PENNSYLVANIA STATE</b>	:	<b>ELECTRONICALLY FILED</b>
<b>SENATE and JUSTIN</b>	:	
<b>FERRANTE,</b>	:	
	:	
<b>Defendants.</b>	:	

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<b>SUZANNE SALOV,</b>	:	
	:	
<b>Plaintiff,</b>	:	
	:	
<b>v.</b>	:	<b>NO. 18-CV-01814</b>
	:	
<b>COMMONWEALTH OF</b>	:	<b>JUDGE JONES</b>
<b>PENNSYLVANIA,</b>	:	
<b>PENNSYLVANIA STATE</b>	:	<b>ELECTRONICALLY FILED</b>
<b>SENATE and JUSTIN</b>	:	
<b>FERRANTE,</b>	:	
	:	
<b>Defendants.</b>	:	

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**OBJECTION IN RESPONSE TO FEBRUARY 27, 2019  
NOTICE OF PROPOSED CONSOLIDATION**

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Defendant Justin Ferrante, by and through his undersigned counsel, objects to the February 27, 2019 Order in the above-captioned matters (Doc. 57 in No. 18-CV-1270 and Doc. 36 in No. 18-CV-1814) on the grounds that, contrary to the allegations in Plaintiffs' Motions To Consolidate Cases and Coordinate Deadlines (Doc. 56 in No. 18-CV-1270 and Doc. 35 in No. 18-CV-1814), he did not "sen[d] a picture of his genitals to the Plaintiffs" and these cases do not involve "identical claims" or allegations of "similar conduct," and, for these and other reasons, the cases are not properly consolidated for purposes of trial. Further, all evidentiary objections are reserved. Notwithstanding these objections, Mr. Ferrante has no opposition to consolidation of these matters under Fed. R. Civ. P. 42 for purposes of discovery and pre-trial deadlines only.

Respectfully submitted,

/s/ Donna A. Walsh

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Dated: March 6, 2019

## **CERTIFICATE OF SERVICE**

I, Donna A. Walsh, hereby certify that a true and correct copy of the foregoing Objection in Response to February 27, 2019 Notice of Proposed Consolidation was served upon the following counsel of record via the Court's ECF system on this 6th day of March, 2019:

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/s/ Donna A. Walsh